

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO, TENNESSEE
CONSOLIDATED RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, FJÄRDE AP-FONDEN,
PENSIONS KASSERNES ADMINISTRATION A/S,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CITIGROUP INC., CHARLES O. PRINCE, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN, TODD S.
THOMSON, ROBERT DRUSKIN, THOMAS G.
MAHERAS, MICHAEL STUART KLEIN, DAVID C.
BUSHNELL, JOHN C. GERSPACH, STEPHEN R.
VOLK, GEORGE DAVID and KPMG LLP,

Defendants.

ECF Case

No. 08-CV-0135 (SHS)

**JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING SCHEDULING**

Plaintiffs, Public Employees' Retirement Association of Colorado, Tennessee Consolidated Retirement System, Sjunde AP-Fonden, Fjärde AP-Fonden, and Pensionskassernes Administration A/S ("Plaintiffs") and Defendants, Citigroup Inc., Charles O. Prince, Sallie L. Krawcheck, Gary L. Crittenden, Todd S. Thomson, Robert Druskin, Thomas G. Maheras, Michael Stuart Klein, David C. Bushnell, John C. Gerspach, Stephen R. Volk, George David, and KPMG LLP ("Defendants") jointly submit the following Stipulation and [Proposed] Order Regarding Scheduling, in support of which they state as follows:

WHEREAS, Plaintiffs filed their Class Action Complaint for Violations of the Federal Securities Laws ("Complaint") and Motion for Consolidation, Appointment as Lead Plaintiffs and Approval of Co-Lead Counsel on January 7, 2008;

WHEREAS, Plaintiffs filed a Motion to Require Related Parties to Preserve Documents and Other Evidence ("Document Preservation Motion"), and a Motion for an Order Partially

Lifting the Private Securities Litigation Reform Act Discovery Stay (“Discovery Stay Motion”) on January 7, 2008;

WHEREAS, the Court ordered on January 22, 2008 that all movants for the consolidation of the related securities class actions, appointment as lead plaintiffs, and approval of selection of lead counsel, including Plaintiffs (collectively, the “Lead Plaintiff Motions”), file any oppositions to the Lead Plaintiff Motions by January 28, 2008;

WHEREAS, the Court has scheduled oral argument on the Lead Plaintiff Motions for February 8, 2008;

WHEREAS, counsel for Defendants have represented that Defendants are endeavoring to meet their document preservation obligations, including those under the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b)(3)(C)(i); and

WHEREAS, Plaintiff and Defendants agree that good cause exists to extend the date by which Defendants shall file any responsive pleading to the Complaint, and any opposition to the Document Preservation Motion and Discovery Stay Motion;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, through their counsel of record, that:

1. Service of the Complaint, Document Preservation Motion, and Discovery Stay Motion was effectuated on Defendants on January 17, 2008.
2. Defendants need not answer or otherwise move against the Complaint or any consolidated complaint until either a date for such answer or motion is established by a Case Management Order, or a date is agreed to by Plaintiffs and Defendants and approved by the Court following the Court’s appointment of Lead Plaintiffs.
3. Defendants shall file any opposition to the Document Preservation Motion and the Discovery Stay Motion on or before February 25, 2008.

4. Plaintiffs shall file any reply in further support of the Document Preservation Motion and the Discovery Stay Motion on or before March 11, 2008.

IT IS SO STIPULATED.

Dated: New York, New York
January 28, 2008

By: 

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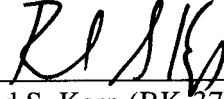
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SO ORDERED:

Hon. Sidney H. Stein, U.S.D.J.